

abused the public court filings for ad hominem attacks directed at Dean Eramo while simultaneously seeking to conceal from the public the underlying facts and Respondent's sworn testimony regarding Respondent's interactions with Dean Eramo. Accordingly, as an alternate form of relief on Plaintiff's Motion to Strike, Plaintiff respectfully requests that the Court modify its April 4, 2016 Order [Dkt. 73] order to remove the "Confidential" designation from those limited portions of Respondent's recent deposition testimony in which she described her interactions with, and her impressions of, Dean Eramo.

Dated: April 19, 2016

Respectfully submitted,

By: /s/ Thomas A. Clare
Thomas A. Clare (VA Bar No. 39299)
Elizabeth M. Locke (VA Bar No. 71784)
Andrew C. Phillips (VA Bar No. 88880)
CLARE LOCKE LLP
902 Prince Street
Alexandria, Virginia 22314
Telephone: (202) 628-7400
tom@clarelocke.com
libby@clarelocke.com
andy@clarelocke.com

ATTORNEYS FOR PLAINTIFF NICOLE ERAMO

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Nicole Eramo's Reply Brief in Support of Her Motion to Strike Nonparty Respondent "Jackie's" Personal Attacks on Plaintiff in her Court Filings was served on the below counsel of record on April 19, 2016 via ECF (for those attorneys that have registered), or by email and Federal Express (for those attorneys that have not).

Pat A. Cipollone
Rebecca R. Anzidei
Philip J. O'Beirne
Stein Mitchell Cipollone Beato & Missner LLP
1100 Connecticut Avenue N.W., Suite 1100
Washington, D.C. 20036
Telephone: (202) 737-7777
Fax: (202) 296-8312
Email: pcipollone@steinmitchell.com
pobeirne@steinmitchell.com
Email: ranzidei@steinmitchell.com

Palma Pustilnik
Staff Attorney
Central Virginia Legal Aid Society
1000 Preston Avenue, Suite B
Charlottesville, VA 22903
Telephone: (434) 327-1443
Fax: (434) 296-5731
Email: palma@cvas.org

Attorneys for Nonparty Respondent "Jackie"

Michael John Finney
William David Paxton
Gentry Locke Rakes & Moore
P.O. Box 40013
Roanoke, VA 24022-0013
Telephone: (540) 983-9373
Telephone: (540) 983-9334
Fax: (540) 983-9400
Email: finney@gentrylocke.com
Email: paxton@gentrylocke.com

Elizabeth A. McNamara
Samuel M. Bayard
Davis Wright Tremaine LLP

1251 Avenue of the Americas
21st Floor
New York, New York 10020
Telephone: (212) 489-8230
Fax: (212) 489-8340
Email: lizmcnamara@dwt.com
Email: samuelbayard@dwt.com

Alison B. Schary
DAVIS WRIGHT TREMAINE LLP
1919 Pennsylvania Avenue NW, Suite 800
Washington, DC 20006-3401
Telephone: (202) 973-4248 Fax: (202) 973-4448
E-mail: alisonschary@dwt.com

*Attorneys for Defendants Rolling Stone LLC,
Sabrina Rubin Erdely, and Wenner Media LLC*

Dated: April 19, 2016

By: /s/ Thomas A. Clare
Thomas A. Clare